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 EG&G - ROCKY FLATS PLANT
 ENVIRONMENTAL MANAGEMENT

ROCKY FLATS PLANT	Manual No.:	2-11000-ER-ADM (a.k.a. 3-21000-ADM)
ERM ADMINISTRATIVE PROCEDURES MANUAL	Procedure No.:	Table of Contents, Rev 20
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CATEGORY 1	Organization:	Environmental Restoration

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 ADMINISTRATIVE PROCEDURES MANUAL**

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ROCKY FLATS PLANT

Manual No.:

2-11000-ER-ADM

(a.k.a. 3-21000-ADM)

ERM ADMINISTRATIVE
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CATEGORY 1

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Rocky Flats Environmental Technology Site

2-G21-ER-ADM-18.03

REVISION 1

ENVIRONMENTAL RESTORATION PROGRAM DIVISION READINESS ASSESSMENTS

APPROVED BY: S.G. Stiger / S.G. Stiger / 18-18-94
Director, Print Name Date
EG&G Environmental Restoration Program Division

M.L. Bonds / M.L. Bonds / 18-17-94
Quality Assurance Program Manager Print Name Date
Data Management and Reporting Services

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Responsible Organization: Environmental Restoration Program Division Effective Date: 8-24-94

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Environmental Operations Management
ERM Solar Pond Projects
Group 1 Closures
Industrial Area OU Closures/D&D Team
OU 2 Closure
OU 4 Closure
OU 5,6,7 Closures
Performance Assurance

USE CATEGORY 4

ORC review not required

This procedure supersedes procedure 3-21000-ADM-18.03, Revision 0.

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1. PURPOSE

This procedure defines the methods and responsibilities for conducting Readiness Assessments (RAs) by describing the steps used to obtain appropriate authorization for, and ensure appropriate control of, activities conducted by EG&G Rocky Flats, Inc. (EG&G) Rocky Flats Environmental Technology Site (RFETS) Environmental Restoration Program Division (ERPD). When performed, RAs provide the means for verifying and documenting that specified prerequisites and requirements have been satisfied, and that a facility, system, or process (including a field activity) is ready to safely operate, restart, occupy, or proceed to the next phase, such as from planning to the initiation of a site investigation, or to remediation.

2. SCOPE

This procedure applies to ERPD-controlled non-nuclear activities at RFETS, and particularly to ERPD activities discussed in the Statement of Work in the Final Environmental Restoration Interagency Agreement (IAG), and to other activities that may be designated. Specifically, RAs are performed before the initiation of work under any Operable Unit (OU) or any other field activity to include, but not be limited to, Resource Conservation and Recovery Act (RCRA) Facility Investigation/Remedial Investigation (RFI/RI) work plans (WPs), baseline risk assessments, treatability studies, remediation tasks, accelerated cleanup projects, decontamination and decommissioning activities, or any other activity designated by a Responsible Manager (RM).

This procedure addresses the following topics:

- Initiating an RA
- Preparing the RA Notice
- Developing the Checklist
- Resolving Checklist Comments
- Verifying the Checklist (conducting the RA)
- Preparing and Issuing the Evidence of Readiness Report
- Closing Poststart Open Items

If another type of readiness review or readiness assessment is required by a higher-level procedure, this procedure does not supersede the higher-level procedure. Specifically, if the completion of Appendix 2, the Readiness Assessment Worksheet (RAW), indicates that the subject activity is classified as nuclear, this procedure shall defer to the requirements and instructions of 1-H24-ADM-10.01, Startup and Restart of Nuclear Facilities. However, the Manager, Environmental Operations Management (EOM) may require implementation of this procedure even if another type of readiness review or readiness assessment is to be done or is required by a higher-level procedure.

This procedure applies to all EG&G employees and subcontractors participating in ERPD activities. An RA may also be conducted for activities in support of agency-directed research and development and technology demonstrations.

2. SCOPE (continued)

This revision is a total rewrite and revision bars are omitted. This revision supersedes 3-21000-ADM-18.03, Revision 0.

3. OVERVIEW

The RA is not a method to gain readiness to start or resume program work. However, it verifies that management has achieved readiness to operate before starting or resuming work.

This procedure contains instructions and explanations to guide RMs in initiating the ERPD RA process, and in meeting the RA requirements. RAs are developed and conducted to ensure that, before starting operations, designated activities have been defined and approved in accordance with the IAG, including agency directives, and applicable Department of Energy (DOE) Orders. Emphasis is placed on compliance with environmental, operational, health and safety, quality assurance, and training requirements.

The RA process is also intended to verify compliance, as applicable, with operational or other requirements of other RFETS organizations, such as those of Waste Management, Engineering and Safety Services, Radiological Health and Engineering, and others. The need for such verifications is dictated by the scope of the activity involved, which may include requirements set forth by existing upper tier documents. Specific verifications may also be based on project-applicable requirements as stated in ERPD Operations Procedures (OPS), Health and Safety Plans (HASPs), Memoranda of Understanding (MOUs), and other similar documents. The RA process does not generate requirements such as those indicated above, but verifies ERPD compliance with requirements, as applicable.

This procedure also provides guidance for the development and closure of Checklists which provide the primary means of administrative continuity for the RA process. Each Checklist is developed with input from a Team composed of technically knowledgeable individuals under the leadership of the ERPD RA Coordinator. At a foundational level, the Checklists employ elements of the following programmatic documents:

- Rocky Flats Interagency Agreement (IAG)
- Rocky Flats Plant Sitewide Quality Assurance Project Plan (QAPjP) for Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) RFI/RI Studies and RCRA Facility Investigations/Corrective Measures Studies Activities
- RFETS ERPD Quality Assurance Program Description (QAPD)

3. OVERVIEW (continued)

Finally, this procedure describes the administrative process by which an activity authorization is provided and documented, following successful closure and verification of Checklist items. Appendix 1, ERPD Readiness Assessment Flow Chart provides an overview of the RA process.

3.1 Issues Addressed in Developing This Procedure

In the complex and dynamic ERPD operating environment, RMs need assistance with determining the applicability of numerous internal and external compliance requirements. A number of established sitewide programs may also impact the preparations for operations. The RA process and the Checklist, in addition to documenting readiness, are intended to provide a planning tool rather than present a last minute administrative frustration. The following objectives summarize the primary issues addressed:

- The ERPD RA process is not intended or designed to reevaluate preexisting programmatic elements. The objective is to employ a graded approach. This approach connotes a risk-based methodology for analyzing work activities that determine the degree of rigor and appropriate type of control required to optimize employment of human and material resources while meeting applicable standards and requirements. This objective also embraces the concept that if, for example, an Integrated Work Control Program (IWCP) package is required and approved, verification of such approval is accepted as constituting compliance with the requirements incumbent in that program.
- The primary objective of the ERPD RA process is to facilitate appropriate distinctions between readiness reviews of nuclear versus non-nuclear activities. This procedure is not intended to comply with DOE Order 5480.31, Startup and Restart of Nuclear Facilities. In accordance with the definitions in DOE Order 5480.31 and the thresholds for radionuclides listed in Table A.1 of DOE-STD-1027-92, Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports, ERPD facilities and activities are not, generally, defined as nuclear. Therefore, this procedure is more directed towards compliance with DOE Order 5481.1B, Safety Analysis and Review System, which is applicable to non-nuclear facilities. Appendix 2 of this procedure makes provision for identifying those ERPD activities that might be defined as nuclear and, therefore, be subject to the provisions of DOE Order 5480.31.
- The objective is to involve the RM early in the RA process, taking advantage of project knowledge to help ensure the proper content and rigor for the RA.

3.1 Issues Addressed in Developing this Procedure (continued)

- The objective of the RA process is to encourage Checklist development as early as possible in the project's development. The desired result is that at the time of the startup the project is, with increased certainty, in compliance with applicable environmental, operational, health and safety, quality assurance, and training requirements. An RA is not intended to present, either in perception or in fact, an impediment to operational progress.

4. DEFINITIONS

Activity Authorization Form (AAF). The form used to document the final authorization to begin an activity once the RA has been completed. The AAF represents:

- Approval by the Director, ERPD.
- Authorization by the Manager, EOM.
- Acknowledgement of conditions and responsibility for open items by the Responsible Manager.

Evidence of Readiness Report. A documented summary of the RA prepared by the ERPD RA Coordinator.

Graded Approach. A risk-based methodology that analyzes work activities to determine the degree of rigor and appropriate type of control required to optimize employment of human and material resources while meeting applicable standards and requirements.

Individual Hazardous Substance Sites (IHSSs). Individual locations where hazardous substances have come to be located at a discrete area within the RFETS.

Land Use Request (LUR). The LUR form identifies the location and type of work to be accomplished, and is required for all activities within the Buffer Zone.

Non-nuclear Facility. A defined location or locations where activities or operations do not involve radioactive and/or fissionable materials in such form and quantity that there is no potential nuclear hazard to employees or the general public (that is, levels are below Hazard Category 3 radionuclide threshold levels as listed in Table A.1 of DOE-STD-1027-92, Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear safety Analysis Reports).

Operable Unit (OU). Groupings of IHSSs into a single management area, as defined in the IAG Statement of Work.

Operational Safety Requirements (OSRs). The requirements stated in the applicable safety analysis reports.

4. **DEFINITIONS (continued)**

Poststart Open Item. A Checklist item that has not been closed and verified; and that, in the judgement of the RA Coordinator, may be cleared (closed) and verified after the authorization of operations without significant risk to the environment, project personnel, or the general public. A Poststart Open Item must carry a commitment from the responsible party for the closure action required, and the closure date must be specified.

Prestart Open Item. A Checklist item that has not been closed and verified; and that, because of the potential impact, must be cleared (closed) and verified before the authorization of operations.

Readiness Assessment (RA). A requirements-based process that investigates and provides the means for verifying and documenting that specified prerequisites and requirements have been satisfied, indicating that a facility, system, or process (including a field activity) is ready to safely operate, occupy, or proceed to the next phase (such as from planning to initiation of site characterization or to remediation).

RA Board (Board). An ERPD management team that evaluates the sufficiency of a Checklist and, thereby, the scope of the RA. Normally, the Directors or direct-report Managers of non-affected ERPD organizations serve as Board members. The Manager, ERPD EOM, usually serves as the Chairperson.

RA Checklist (Checklist). A list of prerequisites, requirements, and other information that forms the basis for the RA, provides guidance for assessing readiness, and provides administrative continuity to the RA process. The ERPD RA Coordinator develops the Checklist.

RA Notice. A formal memorandum that provides:

- Scope and purpose, broadly identifying areas, and items to be assessed.
- Planned dates, times, locations, and other logistical information.
- Identification of the Board membership.
- Identification of the Team membership.

RA Team (Team). A group of individuals cognizant of the WP, Field Sampling Plan (FSP), Project Management Plan, and other activity baselines. The Team participates in generating the Checklist, and assesses and demonstrates to the Board the readiness of an activity to proceed (in other words, demonstrates that prerequisites have been met). The ERPD RA Coordinator serves as the Team leader.

4. **DEFINITIONS (continued)**

Work Plan (WP) and Field Sampling Plan (FSP). Detailed plans developed for each OU, OU subprojects, and selected sitewide activities (such as environmental evaluations and treatability studies) which ensure that each site is fully characterized and that a baseline risk assessment is performed. In addition to detailed technical discussions, each WP and FSP includes:

- Quality Assurance Addendum (QAA), that outlines those site- or project-specific measures taken to meet the requirements of the QAPjP.
- Data Quality Objectives that are qualitative and quantitative statements that specify the quality of data required to support decisions.
- OPS, including Document Modification Request(s) as needed to supplement existing procedures, that are required to properly implement the WP and FSP.
- Provision for the use of a scientific notebook, as applicable.

5. **RESPONSIBILITIES**

5.1 **Director, ERPD**

Provides oversight for the implementation of this procedure.

Provides final resolution on any disputes that cannot be resolved by the Board Chairperson.

Provides, on the AAF, conditional approval for the continuation or startup of operations.

5.2 **ERPD Commitments Tracking (CTS) Coordinator**

Ensures that Checklist Open Items are entered into the ERPD CTS, as appropriate.

5.3 **ERPD Document Control Center**

Ensures that RA records are managed in accordance with 2-G18-ER-ADM-17.01, Quality Assurance Records Management.

5.4 **ERPD Quality Assurance Program Director**

Provides concurrence for activities relative to compliance with Quality Assurance (QA) requirements.

Assigns a Subject-matter Expert to serve as a member of each and every Team.

5. RESPONSIBILITIES (continued)

5.5 ERPD Health and Safety Officer

Reviews and approves all HASPs related to ERPD activities.

Serves as a Team member, as requested.

5.6 ERPD Internal Assessments

Ensures that the Checklist Open Items which affect quality are properly identified for an audit or surveillance.

5.7 ERPD RA Coordinator

Coordinates with the RMs to ensure that RAs are conducted when appropriate.

Serves as the Team leader and designates Team members.

Ensures that the Board members, Team members, and RMs or Project Managers (PMs) complete training in this procedure (Reading this procedure constitutes required training in accordance with 1-10000-TUM 02.18, Qualification, Certification, and Continued Training) and other applicable documents deemed appropriate in accordance with 3-21000-ADM-02.01, Training.

Is responsible for development of Checklists.

Provides recommendation to the Manager, EOM, for the authorization to continue or start operations.

Prepares and distributes copies of the Evidence of Readiness Report to the RMs, the affected organizations, and contractor(s) or subcontractor(s).

Ensures that records are complete and transmitted to the ERPD Project File Center (PFC) in accordance with 2-G18-ER-ADM-17.01.

5.8 ERPD Sample Management (functional title)

Provides concurrence for activities that may require submission of data to Rocky Flats Environmental Data System (RFEDS).

5. RESPONSIBILITIES (continued)

5.9 Manager, EOM

Ensures the implementation of this procedure.

Designates the ERPD RA Coordinator.

Selects and appoints Board members.

Serves as the Board Chairperson (with exception in accordance with Step 6.3[6]).

Affirms designation of Team leader and Team membership.

Provides recommendation to the Director, ERPD, for the approval to continue or start operations.

Provides, on the AAF, the final authorization for the continuation or startup of operations.

5.10 RA Board (Board)

Provides independent review and approval of Checklists.

5.11 RA Team (Team)

Contributes individual and collective expertise to the development of the Checklist scope and content.

Develops dispositions to the Board comments.

Assists in providing the necessary documentation to close and verify the Checklist items.

5.12 Responsible Manager or Project Manager

Initiates the request for an RA.

Serves on the Team for the RAs conducted on projects or activities for which the RM or PM is responsible.

Ensures that the Checklist Open Items are appropriately closed and verified.

5. RESPONSIBILITIES (continued)

5.13 Responsible Managers, ERP

Provide input and verifications, as required, on the requirements as indicated in the project baseline documents.

Provide Team member(s) representing the requisite expertise, as requested. Expertise may be required from any of the groups within ERP.

6. INSTRUCTIONS

- NOTE 1** *The RA Worksheet (RAW) (Appendix 2, ERPD Readiness Assessment Worksheet) and the Checklist are used to document the evaluation of an activity's readiness to begin, and the authorization to do so. As necessary, information provided on a RAW may be continued on additional blank pages, with the form header on each additional page.*
- NOTE 2** *The ERPD RA Coordinator may vary or modify the specific administrative steps described in this procedure in keeping with the concept of the graded approach, as long as the overall integrity of the assessment is maintained.*
- NOTE 3** *If field work or activity is suspended for more than 30 days, the RM must again initiate the RA process, even though a RA may have been previously completed for the activity.*

6.1 Initiating an RA

RM

- [1] Ensure that all requirements that are prerequisite to initiating the subject activity are being addressed before initiating an RA, following the general guidance provided in the RAW.
- [2] Verify that the activities affecting data quality or safety and health can be completed using existing procedures and instructions, such as approved WPs and HASPs.
- [3] **IF** adequate procedures and instructions do **NOT** exist,
THEN arrange for the required procedures or instructions to be:
- Prepared.
 - Approved.
 - Controlled.
- [4] **WHEN** the necessary prerequisite requirements have been met,
THEN initiate the balance of this procedure to obtain the authorization to initiate the subject activity.
- NOTE** *Approval to proceed, in the form of a signed AAF, must be obtained before the initiation of the subject activity.*
- [5] Complete Page 1 of the RAW.
- [6] Submit Page 1 of the RAW to the ERPD RA Coordinator with a memorandum requesting an RA.

6.2 **Preparing the RA Notice**

NOTE 1 *The request for an RA needs to be made at least 30 days before the scheduled or anticipated implementation or start date.*

NOTE 2 *Determination of the applicability of the RA process to a given activity is a management decision, based on process, project, and programmatic knowledge. Section 2 of this procedure provides general guidelines on the applicability of the RA process.*

ERPD RA Coordinator

- [1] Determine if the activity is subject to an RA.
- [2] **IF** the activity is **NOT** subject to an RA,
THEN:
 - [A] Issue a memorandum to the RM explaining the rationale for the determination, with copies as appropriate.
 - [B] Exit this procedure.
- [3] **IF** the activity is subject to an RA,
THEN schedule a conference with the RM to:
 - [A] Ensure training and familiarization with this procedure.
 - [B] Discuss the project status and schedule.
 - [C] Complete Pages 2 and 3 of the RAW.
 - [D] Discuss the composition of the Team.
 - [E] Assign an RA identification number.
- [4] Prepare the RA Notice (Appendix 3, ERPD Readiness Assessment Notice), and submit the RA Notice with the proposed Team and Board memberships to the Manager, EOM.

Manager, EOM

- [5] Verify that the activity falls within the scope of the ERPD RA program, and approve the Team and the Board as designated by signing the RA Notice.

6.2 Preparing the RA Notice (continued)

Manager, EOM (continued)

- [6] **IF** the activity is **NOT** subject to an RA,
THEN:

[A] Issue a memorandum, with copies as appropriate, to the RM explaining the rationale for the determination.

[B] Exit this procedure.

ERPD RA Coordinator

- [7] Distribute the completed, approved RA Notice to all affected personnel.

6.3 Developing the Checklist

Appendix 4, ERPD Readiness Assessment Checklist is a sample of a Checklist. The Checklist criteria should be focused so that, at a minimum, the assessment elements listed on Pages 2 and 3 of the ERPD RAW (Appendix 2) are evaluated and verified as either applicable or not applicable. For non-RFI/RI activities, similar areas may be addressed.

Appendix 2 also contains Suggested Minimum ERPD Checklist Criteria that provides guidance on programmatic and interorganizational elements. The applicable documents require approval, as appropriate, by the:

- DOE.
- Environmental Protection Agency (EPA).
- Colorado Department of Health (CDH).
- Director, ERPD.
- Appropriate RM(s).

ERPD RA Coordinator

- [1] Prepare an initial draft of the Checklist, using the completed RAW as a baseline document.

Team

- [2] Evaluate and verify the adequacy of the Checklist scope and content, using collective Team expertise and RAW criteria.

ERPD RA Coordinator

- [3] Complete the Checklist.

[A] Compile and incorporate all Team input.

[B] Verify and incorporate all requirement source citations.

6.3 Developing the Checklist (continued)

ERPD RA Coordinator (continued)

- [C] Verify and incorporate the names of the RA task support individuals and the due dates into the Checklist.

Team

- [4] Concur with the Checklist scope and content by signing on the final page.

ERPD RA Coordinator

- [5] Submit the completed Checklist to the Board for approval.

- [A] Include any pertinent backup or explanatory information.

- [B] State the date by which comments are due.

NOTE *The fact that the Checklist content may be considered completed at this point does not preclude the addition, at some later date, of item(s) deemed appropriate by the Team.*

Board

- [6] Review the scope and content, not the status, of the RA, using the Checklist as the primary review document.

NOTE 1 *If the subject activity falls primarily under the management responsibility of the EOM Manager, the Board designates another of its members as Chairperson for the RA of that activity.*

NOTE 2 *Appendix 6, ERPD Readiness Assessment Comment Record may be used to provide comments, if desired.*

- [7] Provide comments as appropriate to the Board member's area of expertise and programmatic concerns.

NOTE *If comments are not received by the ERPD RA Coordinator within 5 working days of submission (Step [4][B]), the status is considered as a No Comment. A No Comment constitutes an individual's approval of the Checklist.*

- [8] Submit comments to the ERPD RA Coordinator.

6.3 **Developing the Checklist (continued)**

ERPD RA Coordinator

- [9] **IF**, collectively, the Board does **NOT** have any comments or concerns regarding the submitted Checklist,
 THEN go to Section 6.5, Verifying the Checklist.

6.4 **Resolving Checklist Comments**

ERPD RA Coordinator

- [1] **IF** the Checklist requires revision as a result of Board comments,
 THEN submit the comments to the Team for resolution.

Team

- [2] Discuss the comments and develop resolutions.
- [3] Document resolutions on the RA Comment Record.

ERPD RA Coordinator

- [4] Submit the Checklist with the RA Comment Record (proposed resolutions) to the Board for approval and return to Step 6.3[5].

NOTE *If appropriate/required for final resolution, the Chairperson may submit an unresolved issue to the Director, ERPD, for final disposition.*

Board Chairperson

- [5] **IF** Board agreement on proposed resolutions **CANNOT** be reached,
 THEN decide on the resolution.

- [6] Submit the approved Checklist to the ERPD RA Coordinator.

NOTE *Documentation of resolved Board comments, if any, constitutes Board approval of the Checklist.*

6.5 **Verifying the Checklist (Conducting the RA)**

Team

- [1] Provide verification/closure documentation for each Checklist item, as assigned.

6.5 Verifying the Checklist (Conducting the RA) (continued)

ERPD RA Coordinator

NOTE *Appendix 5, Suggested Minimum ERPD Readiness Assessment Checklist Criteria provides guidance on the suggested minimum closure documentation to be required.*

[2] Verify that each listed Checklist requirement has been met.

[3] Date each item on the Checklist, using the date verified.

[A] Attach documentary evidence or notation for each verification.

[B] Label each verification document with the corresponding Checklist item number and the date the document was received.

[C] **WHEN** an item is **NOT** applicable,
THEN:

[a] Record *N/A* rather than dating the Checklist Item.

[b] Provide an explanation for the *N/A*.

[4] **WHEN** an item remains open (either actually **NOT** complete or **NOT** verified),
THEN determine the status of the item as one of the following:

- Prestart Open Item
- Poststart Open Item

NOTE *Section 4, Definitions distinguishes between Prestart and Poststart Open Items. Any final determination as to whether an item may remain open before the start of operations is made by the Board Chairperson.*

[5] Provide documented commitments on the Checklist as to:

- Name of individual(s) responsible for closing the open items.
- How the open items will be closed.
- The deadline for the open items to be closed.

[6] Repeat this section (6.5) for each Checklist item until one of the following occurs, as required:

- Each item is closed in accordance with Steps 6.5[2] and 6.5[3]
- Provision is made to close each item (Step 6.5[5])

6.6 Preparing and Issuing the Evidence of Readiness Report

ERPD RA Coordinator

- [1] Prepare the Evidence of Readiness Report to include:
 - A summary of all open items and the potential impacts.
 - A copy of the Checklist, revised to the most recent status.
 - A recommendation to grant or withhold approval and authorization to operate, based on the findings of the RA and the status.
 - An AAF (Appendix 7, ERPD Activity Authorization Form).
- [2] Transmit the Evidence of Readiness Report to the Director, ERPD and the Manager, EOM.

Director, ERPD

- [3] Review the Evidence of Readiness Report and the acceptability of the recommendation to approve the subject activity.
- [4] **IF** the recommendation is **NOT** acceptable,
THEN return the entire Evidence of Readiness Report to the Coordinator with comments on concern(s) and for further action(s).

NOTE *The Director, ERPD approval is administratively conditional. The AAF is not to be signed by the Manager, EOM (in other words, final authorization granted) until all Prestart Open Items have been closed and verified.*

- [5] **IF** the recommendation is acceptable,
THEN:

[A] Approve the AAF, by signature as indicated.

[B] Return the entire Evidence of Readiness Report to the Coordinator.

ERPD RA Coordinator

- [6] **IF** the Director, ERPD does **NOT** approve the AAF,
THEN facilitate the resolution of the concerns.
 - [A] Meet with the RM and the Team to clarify and resolve the issues.
 - [B] Verify the status with the Board Chairperson.
 - [C] Incorporate any resulting changes, and repeat Step 6.6[1].

6.6 Preparing and Issuing the Evidence of Readiness Report (continued)

ERPD RA Coordinator (continued)

- [7] **WHEN** the AAF is approved by the Director, ERPD,
 AND all Prestart Open Items are closed and verified,
 THEN:

[A] Present the approved AAF to the Manager, EOM.

[B] Notify the RM of the authorization status.

Manager, EOM

- [8] **WHEN** all Prestart Open Items have been properly closed and verified,
 THEN:

[A] Sign the AAF, providing the final authorization to operate.

[B] Return the AAF to the Coordinator.

ERPD RA Coordinator

- [9] Present the approved and authorized AAF and final Checklist to the RM for concurrence.

[A] Review the status of any Poststart Open Items.

[B] Verify that the RM's signature is an acknowledgement of the primary responsibility for closure of any remaining open items.

NOTE 1 *Work may be subject to limitations as described by open items.*

NOTE 2 *Required corrective or closure action(s), individual(s) practicably responsible, and required completion date(s) for all open items are specified in the final Checklist.*

RM

- [10] Initial all Poststart Open Items in the *RA task support* block on the final Checklist, indicating acceptance of responsibility for closure of the items,
 OR insert the name and obtain the initials of the ERPD Manager to whom responsibility is being designated.

[11] Sign the AAF, concurring with the RR status and accepting open item responsibility.

ERPD RA Coordinator

- [12] Provide a copy of the completed AAF and initialed Checklist to the RM, and place the originals in the RA history file.

6.6 Preparing and Issuing the Evidence of Readiness Report (continued)

ERPDA RA Coordinator (continued)

- [13] Distribute copies of the completed Evidence of Readiness Report to the affected individuals and organizations.

6.7 Closing Poststart Open Items

ERPDA RA Coordinator

- [1] Deliver assigned and verified commitments (See Step 6.6[10]) to the ERPDA CTS Coordinator or ERPDA Internal Assessments, as appropriate.

ERPDA CTS Coordinator

- [2] Ensure that the assigned and verified commitments are entered into and tracked by the ERPDA CTS.

ERPDA Internal Assessments

- [3] Ensure that commitments affecting quality are properly identified for an audit or surveillance.

Responsible Individuals (See Step 6.6[10])

- [4] Ensure that closure commitments are met in a complete and timely manner.
- [5] Provide closure documentation to the ERPDA Commitments Coordinator.

NOTE *Closure documentation is not to be sent directly to the ERPDA RA Coordinator, but to the ERPDA Commitments Coordinator. The ERPDA Commitments Coordinator transmits closure documentation to the ERPDA RA Coordinator.*

ERPDA CTS Coordinator or ERPDA Internal Assessments

- [6] Notify the ERPDA RA Coordinator when closure documentation is received.

ERPDA RA Coordinator

- [7] Verify that the closures, as documented, adequately meet the requirements for closure as stated in the Checklist.
- [8] **IF** a closure action is **NOT** complete or otherwise unacceptable,
THEN:
 - [A] Return the entire closure package to the responsible individual (as identified in Step 6.6[10]) with instructions for further action.
 - [B] Repeat Step 6.7[1]

6.7 Closing Poststart Open Items (continued)

ERPD RA Coordinator (continued)

[9] **WHEN** a closure action is complete,

THEN:

[A] Place the closure package in the RA history file.

[B] Notify the ERPD CTS Coordinator or ERPD Internal Assessments that the action is closed.

7. RECORDS

Management of all records is consistent with 1-77000-RM-001, Records Management Guidance for Records Sources.

The records generated as a result of this procedure are considered quality records. These records are managed in accordance with 2-G18-ER-ADM-17.01, Quality Assurance Records Management.

The only nonquality records generated by this procedure relate to documentation of editorial comments on annotated documents and draft Checklists and copies of the RAW (Appendix 2, ERPD Readiness Assessment Worksheet). These nonquality records may be discarded.

ERPD RA Coordinator

[1] **WHEN** all Open Items have been closed and verified,

THEN ensure that the following quality-related records are transmitted to the ERPD Document Control Center (DCC) in accordance with 2-G01-ER-ADM-06.01, Document Control:

- RA Notices
- Approved Checklists, Checklist comment records, and Checklist Item closure documents
- Evidence of Readiness Report
- Other formal documentation regarding the RA

NOTE *The RA document package is submitted under a table of contents page with sufficient detail to facilitate the location of specific RA documents.*

DCC

[2] Ensure that all RA records are managed in accordance with 2-G18-ER-ADM-17.01.

8. REFERENCES

Rocky Flats Interagency Agreement. 01/22/91

Rocky Flats Plant Environmental Restoration Department Quality Assurance Program Description

Rocky Flats Plant Site-wide Quality Assurance Project Plan for CERCLA Remedial Investigation/Feasibility Studies and RCRA Facility Investigations/Corrective Measures Studies Activities, 05/05/91

DOE Order 5480.31, Startup and Restart of Nuclear Facilities

DOE Order 5481.1B, Safety Analysis and Review System

DOE-STD-1027-92, Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports

1-21000-EMR-AQ.001, Implementation of the Chemical Tracking Process

1-21000-EMR-AQ.02, Notification of Potential Change to Air Emissions

1-21000-EMR-NEPA.01, Implementation of NEPA Documentation

1-21000-EMR-SW.01, Control and Disposition of Incidental Waters

1-77000-RM-001, Records Management Guidance for Records Sources

1-DOE-EPR-END.03, Identification, Protection, and Reporting of Threatened, Endangered, and Special-Concern Species

1-H24-ADM-10.01, Startup and Restart of Nuclear Facilities

2-G18-ER-ADM-17.01, Quality Assurance Records Management

2-G01-ER-ADM-06.01, Document Control

2-11000-ADM, ERPD Administrative Procedures Manual

2-11000-ADM-07.02, Vendor Selection

2-11000-ADM-10.01, Inspections

2-11000-ADM-18.02, Surveillance

8. **REFERENCES (continued)**

3-21000-ADM-02.01, Training

3-21000-ADM-02.02, Personnel Qualification

3-21000-ADM-SW.05, Control of Rocky Flats Flood Waters

3-25000-ADM-AQ.07, Preparation of Air Pollution Emission Notices

3-25000-ADM-AQ.08, Preparation of EPA Form Rs

3-25000-ADM-SW.01, Monthly Discharge Monitoring Report for NPDES

3-25000-ADM-SW.02, Implementation of the Control and Disposition of Incidental Waters

3-25000-ADM-SW.05, Control of Rocky Flats Flood Waters

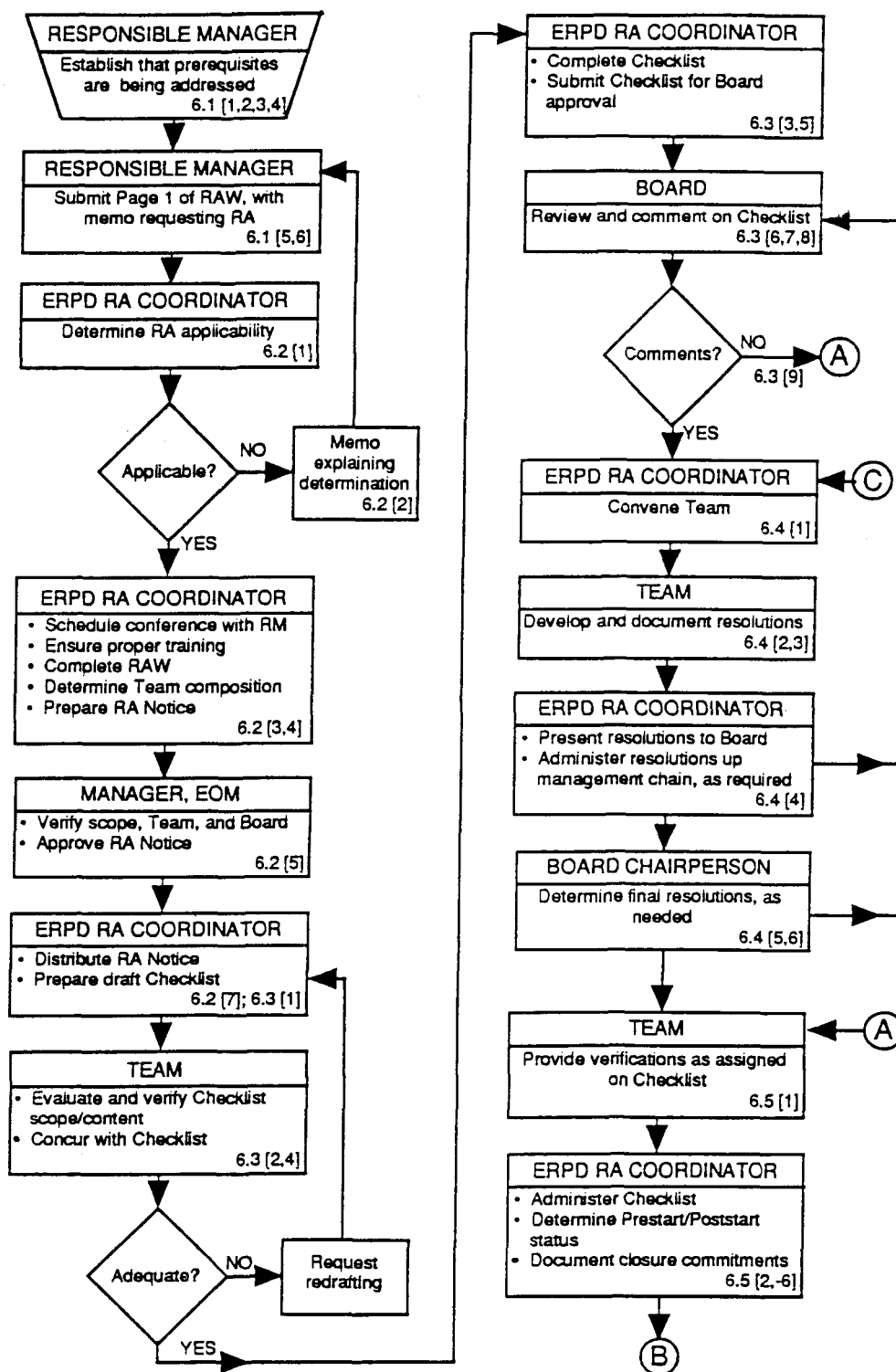
3-25000-OPS-SW.13, Dam Inspection and Monitoring Procedure

29 CFR 1926, Labor

APPENDIX 1

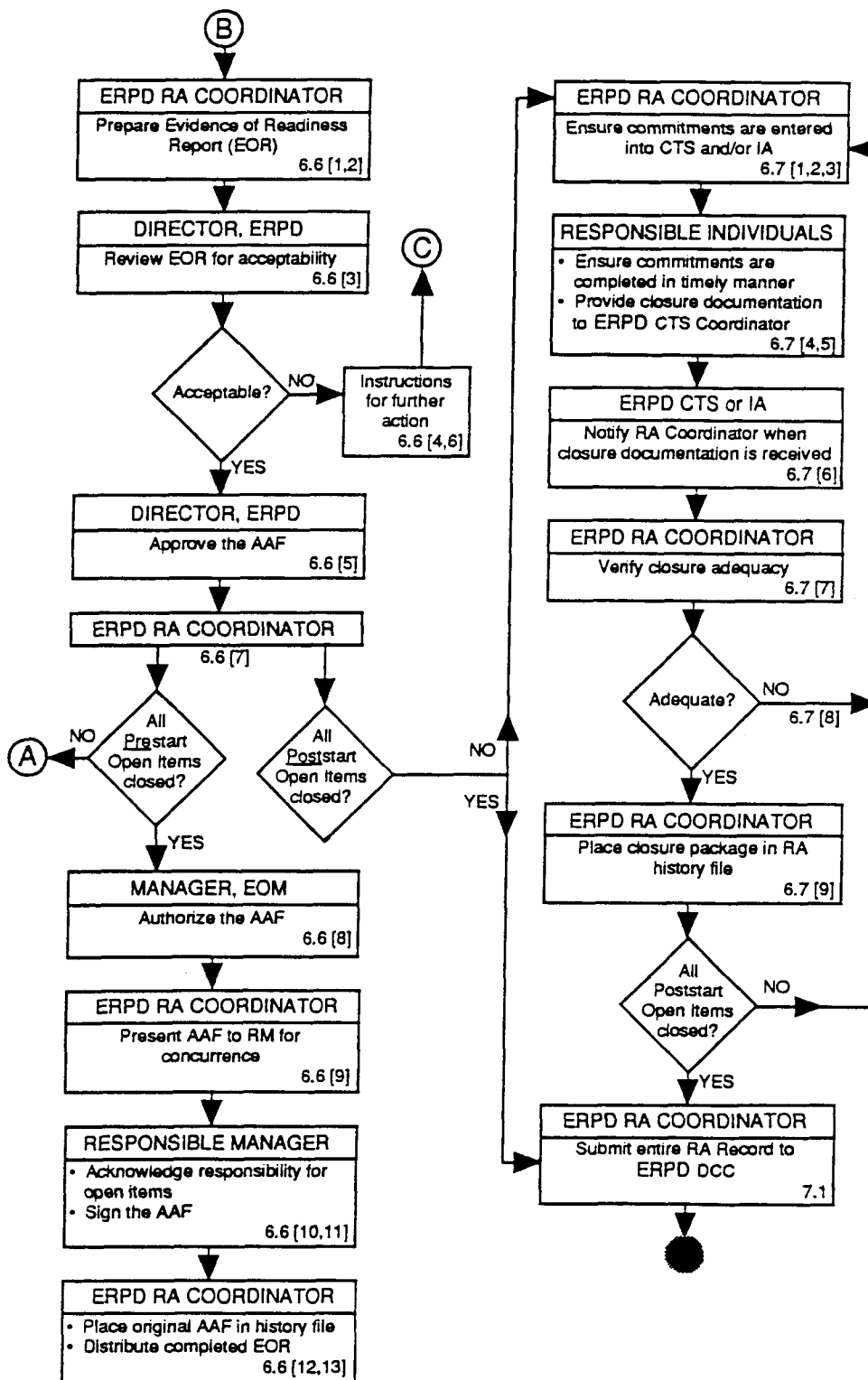
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ERPD READINESS ASSESSMENT FLOWCHART



APPENDIX 1

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APPENDIX 2

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ERPD READINESS ASSESSMENT WORKSHEET

DATE REC'D AT EOM: _____

PAGE 1 OF 3

RESPONSIBLE MANAGER: _____ EXT _____

DATE RAW PREPARED: _____ ANTICIPATED FIELD DATE: _____

ACTIVITY/PROJECT TITLE: _____

WORK PACKAGE NO. _____

SUBCONTRACTOR(S): _____

FACILITY/ACTIVITY DESCRIPTION:

(Attach copy of appropriate SOW section or other descriptive document.)

1. Is the facility/activity identified as a Nuclear Facility (Hazard Cat 1, 2, or 3) in the *Nuclear Safety Manual, I-C10-NSM-04.03, Safety Evaluation Screen*? Yes [] No []
2. Is the facility/activity identified as a Nuclear Facility (Hazard Cat 1, 2, or 3) in the *Rocky Flats Plant Safety Analysis Program Implementation Plan for Nuclear Facilities*? Yes [] No []
3. Are there any known amounts or forms of radioactive materials involved which exceed the Hazard Category 3 threshold levels for radionuclides as listed in Table A.1 of *DOE-STD-1027-92, Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports*? Yes [] No []
4. Is the facility/activity identified as a Nuclear Facility (Hazard Cat 1, 2, or 3) by EG&G Nuclear Safety Engineering? Yes [] No []

If **ANY** of the above are answered "Yes," the ERPD RA procedure may not be applicable.

Contact the ERPD Readiness Assessment Coordinator for further clarification.

5. Has the facility operated or the activity been conducted previously? Yes [] No []

If Yes, provide background attachment.

6. Is this activity/project driven by the IAG? Yes [] No []

7. Does the activity include/involve:

WELDING	Yes [] No []	VITAL SAFETY SYSTEMS	Yes [] No []
EXCAVATION	Yes [] No []	CRITICALITY SAFETY	Yes [] No []
OSRs or LCOs	Yes [] No []	HAZARDOUS WASTE	Yes [] No []
CONSTRUCTION	Yes [] No []	RADIOACTIVE WASTE	Yes [] No []

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RA-_____

PRELIMINARY ASSESSMENT OF OPERATIONAL READINESS ELEMENTS

<u>ITEM</u>	<u>TITLE</u>	<u>SME NAME/EXT</u>
1	Work Plan/Field Sampling Plan	
2	Other Baseline Document	
3	Job Safety Analysis (JSA)	
4	Health and Safety Plan (HASP)	
5	Training and Qualifications (E/G&G)	
6	Training and Qualifications (Subs)	
7	ERPD QA Orientations	
8	Procedures	
	>Approvals	
	>Document Control	
9	Land Use Request	
	>Soil Disturbance Approval	
	>Haz. Waste DetERP Dination	
	>Buffer Zone Authorization/Indoc.	
10	Sample Management/RFEDS	
11	NEPA	
12	Air Quality	
13	Water Quality	
14	Chemical Tracking/Control	
15	Waste Generation/Management	
16	Support Facilities/Operations	
	>Subcontractor Space	
17	Construction Management Memorandum Of Understanding	

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RA-_____

PRELIMINARY ASSESSMENT OF OPERATIONAL READINESS ELEMENTS

ITEM TITLE/ITEM

SME NAME/EXT

18 IWCP

19 Engineering Concurrence

20 Rad Engineering Concurrence

21 Pre-evolution Briefing(s)

22 EOM Plan-of-Day Meeting(s)

23 PA Authorization

APPENDIX 2

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SUGGESTED MINIMUM ERPD READINESS ASSESSMENT CHECKLIST CRITERIA

Checklist closure documentation should, at a minimum, verify the following, even if the item might be "N/A". Many of the following relate directly to the Readiness Assessment Worksheet (RAW). The Responsible Manager (RM) may indicate N/A, stating the justification, on the RAW if the item is not applicable to the activity being reviewed. The Readiness Assessment (RA) Team will evaluate these indications as part of the Checklist development and concurrence.

- **Vital Safety Systems (VSS), Criticality Safety, Operational Safety Requirements (OSRs), or Limiting Conditions of Operations (LCOs)** -- If VSS, Criticality Safety, OSRs, or LCOs are impacted, verify that Engineering and Project Management, Health and Safety, and/or Radiological Engineering concurrence has been obtained. Memos signed by the responsible organizations should be provided as evidence. If verification of these requirements is addressed in a Health and Safety Plan (HASP), cite specific HASP sections.
- **Work Plan (WP) / Field Sampling Plan (FSP) or Other Baseline Control Document (i.e., Project Management Plan, etc.)** -- An approved WP/FSP providing baseline controls for the activity must be approved by all required organizations/agencies and have been issued under the ERPD document control program. A copy of the controlled first and/or approval page(s) of the plan(s), or an exemption letter from EQS verifying an "N/A" status, will usually constitute adequate closure evidence.
- **Health and Safety Plan (HASP)** -- A HASP addressing the activity must be approved by ERPD and Industrial Hygiene (IH) and issued. A Job Safety Analysis (JSA) may be a required prerequisite. A copy of the first and/or approval page(s) of the HASP will usually constitute adequate closure evidence.
- **Training and Qualification (T&Q)** -- Personnel must be trained and qualified to the identified tasks prior to startup of operations. The RM should contact Environmental Data Management & Reporting Department, T&Q Team, for assistance in identifying the applicable training requirements for the tasks/job titles identified. The RM should also review the WP/FSP; contract documents; applicable operating procedures and instructions; ERPD training management plan; and ERPD Procedures 3-21000-ADM-02.01, Training, and 3-21000-ADM-02.02, Personnel Qualification. Applicable requirements may include, but are not limited to, OSHA, RCRA, Drum Handling, Radiation Worker, Waste Generator, Logger, and RFEDS.

APPENDIX 2

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Closure of T&Q Checklist items can take two forms:

- 1) Verification (i.e., TSRs, etc.) indicating that training and qualification is complete; or,
- 2) Written verification, from the Responsible Manager, that a program has been implemented to ensure that needed training is received **and** that personnel do not work on a task until they are trained and qualified to do so.

In either instance above, responsibility-based matrices of both EG&G and subcontractor personnel **MUST** be established which clearly indicate the names of the currently-affected individuals, the training completed, and the dates of completion and/or scheduled training.

[NOTE: If personnel changes are to be made after program start-up, ERPD

Remediation Project Management must be notified of changes at least 1 week prior and be provided with appropriate resumes, training records, and other necessary supporting documents. Record of these changes must be maintained in the project files.]

- **Data Management & Reporting Services (DMRS)** -- Applicable DMRS program documentation and controls necessary to implement the activity must be in place and implemented (i.e., baseline documents and procedures must be approved and controlled). Reference the QAPjP; 2-11000-ADM, ERPD Administrative Procedures Manual; the applicable WP/FSP; and other supporting documents.

It is the RM's responsibility to ensure that adequate DMRS are provided for the activity. Qualified and trained personnel must be available to provide the QA support necessary to implement: WP/FSP development; document changes (DMRs); inspections (2-11000-ADM-10.01, Inspections, etc.); surveillance (2-11000-ADM-18.02, Surveillance, etc.); and vendor qualification (2-11000-ADM-07.02, Vendor Selection, etc.).

- **Procedures** -- Required Operating Procedures (OPs) and instructions (including associated training programs and inspection checklists) must be approved and issued by the controlled document system to the appropriate distribution. These procedures should be clearly referenced in the WP/FSP to ensure operational continuity and integrity. Generally, approval of the WP/FSP, listing the applicable OPs, is sufficient to close and verify that these requirements are met.

[NOTE: If procedures and instructions have not been issued but are "in process," explanation must be provided as to the mechanism being used to ensure that they are approved prior to initiation of a particular affected activity.]

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- **Land Use Request (LUR)** -- A LUR Form must be completed and approved for all activities within an Operable Unit and/or the Buffer Zone. A copy of the first and/or approval page(s) of the LUR will usually constitute adequate closure evidence.

The list of project personnel must be submitted to the Land Use Coordinator to obtain the pERPDisson and passes for appropriate Zone access.

- **Soil Disturbance Approval** -- This process must be completed before and LUR can be approved, and is the vehicle for environmental assessment, worker exposure, site survey, as well as soil disturbance evaluation. It also requires the completion of a **Hazardous Waste DetERPDisson Form** (as required by the Colorado Department of Health (CDH)). This may also require an **excavation authorization/pERPDis** if the activities involve any drilling or soil disturbance. A copy of the first and/or approval page(s) of the LUR (see item above) will usually constitute adequate closure evidence.

[NOTE: Section 01700, Subcontractor Safety and Health Requirement for Service Subcontracts is to be incorporated into all contracts which include construction related activities in accordance with 29 CFR 1926, Labor.]

- **National Environmental Policy Act (NEPA)** -- Applicable NEPA requirements must be implemented. A memo from NEPA to the project will usually constitute adequate closure evidence. In instances of an "N/A", an indication on the RAW (initials of the Responsible NEPA Manager or designee), may provide adequate closure evidence. See 1-21000-EMR-NEPA.01, Implementation of NEPA Documentation.

Compliance with threatened and endangered species legislation is also be required. See 1-D06-EPR-END.03, Identification, Protection, and Reporting of Threatened, Endangered, and Special-Concern Species. The Responsible Manager must notify the NEPA Division within E&WM in advance of field operations.

- **Air Quality Division (AQD)** -- Applicable AQD requirements must be implemented. Verify that procedures are in place to assure compliance with existing pERPDis and regulatory requirements. A memo from AQD to the project will usually constitute adequate closure evidence. In instances of an "N/A", an indication on the RAW (initials of the Responsible AQD Manager or designee), may provide adequate closure evidence. Evidence of exclusion(s) (i.e., CatX) must also be provided.

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Compliance with applicable requirements related to preparation of Air Pollution Emission Notice (APEN) and airborne effluent reporting is required. An "N/A" status must be documented by AQD. See 1-21000-EMR-AQ.02, Notification of Potential Change to Air Emissions; 3-25000-ADM-AQ.07, Preparation of Air Pollution Emission Notices; 3-25000-ADM-AQ.08, Preparation of EPA Form Rs; and other related procedures.

- **Surface Water Division (SWD)** -- Applicable SWD and Environmental Protection and Waste Reporting requirements must be implemented. A memo from SWD to the project will usually constitute adequate closure evidence. In instances of an "N/A", an indication on the RAW (initials of the Responsible Manager or designee), may provide adequate closure evidence. Evidence of exclusion(s) must also be provided.

Verify that procedures are in place to assure compliance with existing pERPDits and regulatory requirements if the activity is implemented. This shall include consultation on potential groundwater requirements. Compliance with applicable requirements related to protection of water quality and effluent reporting is also required. See 1-21000-EMR-SW.01, Control and Disposition of Incidental Waters; 3-25000-ADM-SW.02, Implementation of the Control and Disposition of Incidental Waters; 3-25000-ADM-SW.01, Monthly Discharge Monitoring Report for NPDES; 3-21000-ADM-SW.05, Control of Rocky Flats Flood Waters; and other related procedures.

Compliance with applicable requirements related to control and inspection of dams may be applicable. See 3-25000-OPS-SW.13, Dam Inspection and Monitoring Procedure; 3-25000-ADM-SW.05, Control of Rocky Flats Flood Waters; and other related procedures.

- **Chemical Tracking** -- Implementation of applicable requirements for RFETS is required. See 1-21000-EMR-AQ.001, Implementation of the Chemical Tracking Process.
- **Hazardous Waste** -- [See also the notes regarding the LUR and Soil Disturbance Authorization.] If there is potential for the generation of hazardous waste, verify concurrence by EOM's Investigation Derived Material (IDM) management personnel and generate a memorandum of understanding (MOU) between the project and EOM IDM management. Waste generator training elements must also be defined and addressed.
- **Radioactive Waste** -- If there is potential for the generation of radioactive waste, verify Radiological Engineering concurrence with the activity and that the appropriate interfaces have been established. The ERPD Rad Engineer can facilitate the required verification.

NOTE: If white drums are to be generated, the Responsible Manager must notify: Waste Quality Engineering and Certification, T-130J (2/94 - S. A. Thomatos)

APPENDIX 2

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- **Support Facilities** -- Required support facilities must be arranged for and confirmed with the EOM Field Yard Manager. The RM should review the WP/FSP, procedures, instructions, and other associated documentation and identify the support facilities required to complete the activity; and verify that the identified facilities are available and arrangements have been completed for their use. Ordinarily, the RA Coordinator can confirm (verify/close) this checklist item via teleconference with the EOM Field Yard Manager.

NOTE: Specifically, this includes arrangements for any required waste drum storage, conexes, decontamination activities, subcontractor office/storage space, etc.

- **Inter-organizational Support** -- If support from other RFETS organizations (i.e., organizations outside of ERPD) is required, then verify that the supporting RM(s) has agreed to provide this support and the appropriate interfaces have been established. Memoranda of Understanding (MOU), or concurrence with approved baseline documents (WP/FSP, PMP, etc.) must be provided as closure evidence.

At a minimum, a dated and mutually-executed MOU between ERPD and Construction Management MUST be completed delineating commitment to respective responsibilities.

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ERP D READINESS ASSESSMENT NOTICE

Date:

RR No.

To:

Activity to Be Reviewed:

Scheduled Start Date:

Work Package No.

RR Team:

RR Board:

Other Information:

This activity is within the scope of 2-G21-ER-ADM-18.03, Environmental Restoration Management Readiness Assessments. Team and Board members are as listed above.

Signed: _____

Manager, EOM

Distribution

APPENDIX 4

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ERP READINESS ASSESSMENT CHECKLIST

ITEM NO.	REQUIREMENT / ITEM DESCRIPTION [Source of Requirement]	COMMENTS / >REQUIRED CLOSURE DOCUMENTATION<	P R E D I C T E D	C O N F I D E N T I A L	O L D S E R V I C E	P O S S I B L E	R R T A S O N	DATE DUE	DATE VERI FIED
1.01	A project specific organization structure has been developed and resides in the project's control documents. [QAP] 1.0 §2.0	EOS must verify that the organization structure and interfaces are included in the WP/FSP.	X	O			FRANCHUCK		
1.01A	Specific responsibilities for both EG&G and subcontractor personnel have been clearly established. [QAP] 1.0 §2.0	>Approved WP/FSP< EOS must verify that WP/FSP responsibilities are compatible with those in the SW and as expressed in the org chart(s). >Approved WP/FSP<	X	O			FRANCHUCK		
1.01B	Subcontractor personnel position descriptions have been prepared in accordance with 2-11000-ADM-02.02 for personnel performing/supervising data collection and interpretation. [QAP] 2.0 §4.2	The Position Description Form from ERP 2-11000-ADM-02.02 MUST be used to document subcontractor personnel qualifications.	X	O			FRANCHUCK		
1.02	A Work Package has been developed and approved, including any required Baseline Change Proposal(s) (BCPs). BCPs MUST be approved before work commences.	>Approved cover sheet(s)<	X	O			BICHER/ Wood		
2.01	A Work Plan (WP) and/or Field Sampling Plan (FSP) has been prepared, and reviewed and approved by EPA/CDH and DOE RFO (as appropriate), and ERP, and is under controlled [JAG Att. 2, VI; QAP] 2.0, §3.0	NOTE: The (revised) WP/FSP MUST be APPROVED AND CONTROLLED prior to the commencement of activities.							
2.01A	WP/FSP approved	>Approval page<	X	O			BICHER		
2.01B	WP/FSP controlled	>Controlled distribution transmittal cover<	X	O			BICHER		
2.02	A schedule has been developed and approved for the activities, and is maintained. [DOE 4700.1]	>Schedule, as developed by CP&B support<	X	O			BICHER/ Wood		
2.03	EG&G and subcontractor personnel have documented evidence of required project-specific TRAINING and [QAP] 2.0 §s 4.0 and 4.1; DOE Order 5480.11; RFP ER Site H&S Plan § 4.1.2; RFP 1-10000-TUM §1.0; ERP 2-11000-ADM-2.01;	Finalization of this section will be based upon an analysis by EORM T&Q. NOTE: Not all classes are required for all personnel.					BICHER/ Wood		
2.03A	RESPONSIBILITY-BASED personnel matrices for subcontractors AND for EG&G personnel MUST be provided to facilitate verification of compliance.		X	O					
A.1	OSHA HAZ. WASTE SITE HEALTH & SAFETY TRAINING [29 CFR 1910.20; HSP 21.03; TUM] >>>		X	O					
A.2	>>>OSHA 40-hour (#018-691-03)		X	O					
A.2	>>>OSHA Supervisor (#01-691-01)		X	O					
A.3	>>>8-Hour OSHA Refresher (#018-691-05), if A.1 not current		X	O					
A.4	>>>3-Day On-Site Haz Waste Ops (OJT) (#081-691-07)		X	O					
2.03B	REQUIRED READING [ERP QAP] RFP Policy >>>	Provide copy of signed-off reading list(s) and personnel roster(s).	X	O					
B.1	>>>Applicable OPs as identified in the approved OAA		X	O					
B.2	>>>Environmental Mgt. Radiological Guides (EMRGs)		X	O					
B.3	>>>SSHSP [See also Item 20.03]		X	O					
2.03C	ERP OA Program Overview (420-08-94) [ERP QAP]		X	O					
2.03D	GET Subcontractor (incl. Fire Protection & Gen'l Radiation) (#019-235-04) [DOE 5480.20; TUM]		X	O			Headington		

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ERPD READINESS ASSESSMENT COMMENT RECORD

ERPD READINESS ASSESSMENT CHECKLIST COMMENT SHEET

Please review the attached Readiness Review Checklist: _____				Comment Due Date _____
Readiness Review Number _____				Rev. _____
TITLE: _____				
General (G) comments require resolution but do not require your resolution acceptance. Mandatory (M) comments require resolution by the RR Team and resolution acceptance.				
ITEM (G) or (M)	PAGE	COMMENT	RESOLUTION	Resolution Accepted INIT/DATE
<input type="checkbox"/> No Comments				
RR BOARD MEMBER NAME (PRINT)		SIGNATURE	EXT/PAGER/FAX	DATE SIGNED
Return to:		Bldg.	-- x --	Fax

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ERPD ACTIVITY AUTHORIZATION FORM

ACTIVITY AUTHORIZATION FORM

ACTIVITY TITLE: COLLOID POLISHING FILTER METHOD (CPFM) SITE DEMONSTRATION
FOR THE EPA

ERPD EOM has directed a Readiness Assessment (RA) of the CPFM Site Demonstration designed to verify compliance with ERPD Health and Safety, Training, Quality Assurance, Environmental, and Facility Operations requirements and regulations. The Board recommends that the responsible management and field personnel be authorized to commence operations as described in the reviewed and approved project control documents.

This authorization is expressly contingent upon the closure, *prior to commencement of actual operations*, of all items designated as Prestart on the attached Readiness Assessment Checklist dated September 10, 1993.

AUTHORIZED BY:

Director, Program Division
Environmental Restoration Management

Date

Manager, Environmental Operations Management

Date

I hereby certify the accuracy of the Readiness Review conducted and acknowledge the terms of this authorization to operate.

Manager, CPFM Demonstration Project

Date